

Vanessa R. Waldref
United States Attorney
Eastern District of Washington
Todd M. Swensen
Assistant United States Attorney
402 E. Yakima Avenue, Suite 210
Yakima, Washington 98901
(509) 454-4425

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD LEE RALSTON, JR.,

Defendant.

1:23-CR-02036-MKD-1

AMENDED UNITED STATES'
SENTENCING MEMORANDUM

The United States of America, by and through Vanessa R. Waldref,
United States Attorney for the Eastern District of Washington, and Todd M.
Swensen, Assistant United States Attorney, submits the following United States'
Sentencing Memorandum:

I. Offense Level & Criminal History:

The United States concurs with the Presentence Investigation Report
(PSR) that the minimum term of imprisonment here is 10 years in accordance
with 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii) and 846. *See* ¶ 239. The United

1 States likewise does not object to the PSR with regards to the calculated base
2 offense level of 38 and Total Offense Level calculation of 35. *See* ¶¶ 42-51;
3 240. The United States also concurs with Probation's assessment of Defendant's
4 criminal history category of II. *See* ¶ 259. That said, the United States, in good
5 faith, entered into an agreement with the Defendant wherein the United States
6 agreed to recommend incarceration at the low-end of the Guidelines range,
7 which at the time, the United States reasonably believed would be based on a
8 total base offense level of 33, and which the United States believed was a
9 reasonable and sufficient sentence.
10
11

12 **II. Departures:**

13
14 Based on the United States' agreement with the Defendant, the United
15 States will be requesting a departure from the PSIR Guidelines range to the
16 agreed upon range of 151-188 months incarceration.
17

18 **III. 18 U.S.C. § 3553(a):**

19 The United States has no Section 3553(a) information beyond what is
20 included in the PSR. The United States does not object to the guideline range
21 detailed in the PSR is accurate; however, because the United State agreed to
22 recommend a low-end Guidelines range according to a total base offense level of
23 33, the United State will honor its agreement and recommend a sentence of 151
24
25

26 //

1 months' incarceration. The United States believes this is a sufficient sentence but
2 not greater than necessary to comply with the purposes of 18 U.S.C. § 3553.

3 DATED this 27th day of February 2024.

4
5 VANESSA R. WALDREF
United States Attorney

6
7 
8 TODD M. SWENSEN
9 Assistant United States Attorney

10 //

11
12 CERTIFICATE OF SERVICE

13 I hereby certify that on February 27, 2024, I electronically filed the
14 foregoing with the Clerk of the Court using the CM/ECF System, and a copy was
15 emailed to the counsel of record in this case: Ulvar Klein.
16

17
18 
19
20 Todd M. Swensen
21 Assistant United States Attorney
22 United States Attorney's Office
23 402 E. Yakima Ave., Suite 210
24 Yakima, WA 98901
25 (509) 454-4425
26 Fax: (509) 249-3297
27
28